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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

DYLAN JOSHUA ROBINSON,)	Case No.: 1:24-cv-00828-KES-BAM
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR AN EXTENSION OF TIME
vs.)	
)	
FRANK BISIGNANO,)	
Commissioner of Social Security,)	
)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from June 9, 2025, up to and including July 9, 2025. This is the Defendant's first request for an extension.

Based on a review of the record, undersigned counsel requires additional time to explore settlement options. Defendant apologizes to the Court for any inconvenience caused by this delay. Undersigned counsel contacted Plaintiff's counsel on June 6, 2025, and he had no objection to this request.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: June 9, 2025

/s/ Jonathan O. Peña*

(*as authorized via e-mail on June 6, 2025)

JONATHAN O. PEÑA

Attorney for Plaintiff

Dated: June 9, 2025

MICHELE BECKWITH

Acting United States Attorney

MATHEW W. PILE

Associate General Counsel

Social Security Administration

By: /s/ Noah Schabacker

NOAH SCHABACKER

Special Assistant U.S. Attorney

Attorneys for Defendant

ORDER

Generally, requests for court-approved extensions brought on the required filing date are looked upon with disfavor. L.R. 144(d). However, pursuant to the parties' stipulation, and cause appearing, Defendant shall have an extension, up to and including July 9, 2025, to respond to Plaintiff's Motion for Summary Judgment. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: June 10, 2025

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE